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**EE/CA/ SOUTH PLUME WATER SUPPLY WP  
U.S. DOE FERNALD  
OH6 890 008 976**

**11/05/90**

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LETTER  
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

2442

Original File

NOV 05 1990

REPLY TO ATTENTION OF:

5HR-12

FACSIMILE AND  
FEDERAL EXPRESS

Mr. Andrew P. Avel  
U.S. Department of Energy  
Feed Materials Production Center  
P.O. Box 398705  
Cincinnati, Ohio 45239-8705

RE: EE/CA South Plume  
Water Supply WP  
U.S. DOE Fernald  
OH6 890 008 976

Dear Mr. Avel:

On October 4, 1990, the United States Department of Energy (U.S. DOE) submitted a work plan for part 1 of removal number #3, an alternate water supply for Paddy's Run Road industrial water users. The United States Environmental Protection Agency (U.S. EPA) has reviewed this document and based upon the following deficiencies, U.S. EPA is disapproving the work plan.

General Comments:

1. In accordance with U.S. EPA guidance, the following items need to be added to the work plan:
  - a. Discussion of a preliminary operations and maintenance manual to be completed at the final design stage.
  - b. Discussion of a Quality Assurance Plan for construction-related sampling and testing to be completed at the final design stage.
  - c. Discussion of cost estimates to be completed at the preliminary and final design stages.
2. The work plan should identify the permits (off-site) and permit requirements (on-site) that must be complied with for this removal action.
3. As discussed with U.S. DOE, the work plan should not be titled "Phase I" because of the implication that there are

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more phases to this effort. The term "part" had been agreed on delineate the different aspects of removal #3 for the south plume (water supply, collection wells, and treatment system).

4. A preliminary design document (at 30% complete) should be submitted for review.

**SPECIFIC COMMENTS:**

5. Section III, Page 4, Paragraph 2: The consultant/contractor that will be working on the various phases of the project should be presented (including design and installation).
6. Section III, Page 4, Paragraph 4: Specific analytes used to determine groundwater quality must be presented.
7. Section III, Page 5, Paragraph 5: The project planning activities should be presented. These activities must be addressed in the preliminary design review. The planning activities do not appear on the Attachment I schedule.
8. Section III, Page 6, Paragraph 2: The status of construction personnel 29 CFR 1910.120 training should be specified.
9. Section IV, Page 6, Paragraph 5: The design capacity of the well for Industrial User A and the requirements of the performance acceptance test should be addressed in the preliminary design review.
10. Attachment I, Page 11: Dates must be presented in the schedule.

A revised work plan, which addresses the deficiencies cited above, must be submitted within thirty (30) days of the date of this letter.

Please contact me at (312/FTS) 886-4436 if you have any questions.

Sincerely,



Catherine A. McCord  
On-Scene Coordinator

cc: Richard Shank, OEPA  
Graham Mitchell, OEPA - SWDO  
Leo Duffy, U.S. DOE - HDQ  
Joe LaGrone, U.S. DOE - ORO